



May 4, 2011

Ex Parte

1300 I Street, NW, Suite 400 West
Washington, DC 20005

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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**RE: Video Device Competition; Implementation of Section 304 of the
Telecommunications Act of 1996; Commercial Availability of Navigation Devices;
Compatibility Between Cable Systems and Consumer Electronics Equipment, MB
Docket No. 10-91, CS Docket No. 97-80, PP Docket No. 00-67**

Dear Ms. Dortch:

On May 3, 2011, David Young, Will Johnson and I met with Bill Lake, Chief of the Media Bureau; Michelle Carey, Deputy Chief; Nancy Murphy, Associate Chief; Alison Neplokh, Chief Engineer; Mary Beth Murphy, Chief, Policy Division; Steve Broeckaert, Senior Deputy; and Brendan Murray, Jeffrey Neumann and Lyle Elder of the Media Bureau.

The Bureau indicated that it is continuing to develop its views on the AllVid Notice of Inquiry based on the significant feedback it is receiving. We observed that the market is working to enable consumers to receive multichannel video programming on a variety of devices without the need for a set-top box. The incentive to meet consumers' demand for access to video programming will continue to spur innovation in video devices.

We opposed the notion of requiring all video programming providers, each with different network architectures, to develop one standard application programming interface (API). We noted that consumer electronic (CE) devices used today can and do support multiple APIs. For example, consumers may access services such as YouTube, Netflix and Amazon, which each have different APIs, on a single device. Efforts to require video providers to develop one standard API would be time consuming, costly and contrary to market developments. The market is moving to a multiple application model in which those with content develop applications to enable delivery. This approach is effectively meeting consumers' demands for how they consume content. Requiring that video providers all develop a single API would be completely at odds with technological and marketplace trends. Finally, we discussed the importance to content providers of retaining their ability to ensure that their content remains secure and is not disaggregated as it is delivered to different devices.

Sincerely,

A handwritten signature in black ink, appearing to read "Leora Hochstein".

cc: Bill Lake